

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,)	
)	
)	
v.)	Criminal No. 15-mj-07218-JCB
)	
KALEEM AHMAD,)	
Defendant)	

Motion to Modify Conditions of Release

The Defendant, by and through counsel, hereby moves the Court to modify the conditions of release imposed upon the Defendant. Specifically, the Defendant requests that the condition imposing a \$250,000 secured bond be amended to require an unsecured bond. As grounds, the Defendant is unable to satisfy the \$250,000 secured bond.

Assistant U.S. Attorney Stephen Heymann opposes the proposed modification, but does not oppose an extension of time—to January 6, 2016—for the Defendant to either satisfy the bond condition or appear before this Court to argue the request for modification.

Accordingly, the Defendant requests an Order staying, until further order of this Court, the condition of obtaining a secured bond by December 31, 2015. The Defendant further requests that a hearing on this motion be scheduled for January 6, 2016, at 10:45 a.m.

WHEREFORE, the defendant respectfully requests an Order granting the relief sought.

Respectfully Submitted,

Kaleem Ahmad
By His Attorney

/s/ William H. Connolly
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Certification Pursuant to Local Rule 7.1(a)(2)

Counsel for Defendant Kaleem Ahmad has conferred with Assistant U.S. Attorney Stephen Heymann, whose position is set forth above.

Certificate of Service

I hereby certify that this document filed through the CM/ECF system will be sent electronically to the registered participants as identified on the NEF (NEF) and paper copies will be sent to those indicated as non registered participants on December 30, 2015.

/s/ William H. Connolly